



IOG-131003

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United States Department of the Interior

FISH AND WILDLIFE SERVICE

Dworshak Fish Hatchery
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In Reply Refer To:

February 6, 2017

To: U.S. EPA Region 10, OCE-133

From: Mark Drobish, Dworshak Fish Hatchery Project Leader

Subject: Non-compliance reporting for the discharge of System III "cleaning" water (overflowing/pumping) to the North Fork and Clearwater Rivers

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On February 6, 2017 the Dworshak Fish Hatchery (hatchery) crew cleaned the south half of the System III burrows ponds. The system was set up starting at 9:30 am and the crew began cleaning the system at approximately 9:45 am. A total of 15 of the 16 burrows ponds in use containing both summer steelhead trout and spring Chinook salmon are in use on the south half of System III. This routine cleaning is done to remove solids (i.e. fish feces) to maintain a healthy rearing environment and was conducted as scheduled on Monday, February 6, 2017. The standard protocols for cleaning this system are "Interim Measures" until an engineered solution is developed and implemented to address NPDES requirements. The existing infrastructure for System III does not provide a separate standpipe to direct cleaning water for treatment; therefore, multiple valves, isolation gates and pumps are opened/closed to facilitate transport of the cleaning water to the biofilters. The protocols in place were followed which includes isolating these ponds and utilizing two pumps to transport the "cleaning water" to the System III biofilters while the ponds are swept by staff and then allowed to flush until the ponds are free of solids. Once the ponds have been flushed, the biofilters typically reach maximum capacity (full). One or two staff is assigned to setting up/shutting down the system, additional staff join the effort to sweep the burrows ponds starting at 9:45 am. Once all of the ponds have been swept, only the staff assigned to setting up/shutting down the System remain on-site until the shut down procedures are complete. The assigned staff monitor burrows pond water levels, water level in the channel, monitor pumps and water level in the biofilters.

Specific to the non-compliance discharge, the biofilters were overfilled and therefore; a portion of the water overflowed to the Clearwater River and the supernatant pumps in the biofilters starting pumping the water out of the biofilters which sends this water to the North Fork Clearwater River. The supernatant pumps are set up with a high water switch to turn on to avoid flooding of the sump and biofilter galley in the event of overfilling. However, pumping in this overfilled condition occurs before the solids have had the usual 12 hours of settling time. The system worked as designed. The period of non-compliance lasted approximately 1.5 hours at which time, the pumps turned off when the "normal" full level of the biofilters was reached. The cause of the violation in this situation was "human error" associated with operating the system under "interim measures". Immediately following the non-compliance discharge, Mark Drobish walked through the steps with the employee to ensure they were clear on each step including maximum water levels in the biofilters. The employee is fully knowledgeable and capable of operating the system; however, the employee misjudged the biofilter water level and timing to shut the pumps off resulting in the biofilters overflowing and the result was a non-compliance discharge.

Other factors contributing to the non-compliance discharge:

1. The spring Chinook salmon are typically reared in the raceways; however, the Hatchery experienced a major power outage on November 5, 2016 and operated on partial residential power and two generators until a portable sub-station was installed and full commercial power restored to the hatchery on November 18, 2016. Due to the extended power outage and potential risks to the fish on station, the decision was made to move spring Chinook salmon reared in 20 raceways into 10 burrows ponds in System III for an overall reduction in water use. This decision was made to minimize risk in the event the temporary residential feed failed or our backup generator(s) failed during the extended power outage. The impact associated with this factor is there are 6 additional burrows ponds in operation on the south half of System III; therefore, these burrows ponds also require cleaning. This increases the amount of time to complete cleaning operations and increases the volume of water to be pumped to the biofilters by an additional 4,500 gallons per minute.

If you have any questions regarding this non-compliance discharge, please contact me.

Respectfully,



Mark Drobish
Dworshak Fish Hatchery Project Leader
Office 208-476-2236
Mobile 208-512-9151

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South cleaning waste February 6 2017.doc

B. Reporting of Monitoring Results

The permittee must summarize monitoring results, including influent, effluent, and net results, each month on the Discharge Monitoring Report (DMR) form (EPA No. 3320-1) or equivalent.

1. Paper copy submissions.

The permittee must submit reports monthly, postmarked by the 20th day of the following month. The permittee must also submit an annual report as required in §IV.D, above.

The permittee must sign and certify all DMRs, and all other reports, in accordance with the requirements of Part VII.E. ("Signatory Requirements"). The permittee must submit the legible originals of these documents to the EPA Region 10 Director, Office of Compliance and Enforcement, at the address below with copies to IDEQ at the appropriate address listed in § I.C.1, above:

US EPA Region 10, OCE-133
Attn: ICIS Data Entry Team
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101

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2. Electronic submissions

If, during the period when this permit is effective, EPA makes electronic reporting available, the permittee may, as an alternative to the requirements in §V.B.1, above, submit reports monthly, electronically by the 20th day of the following month, following guidance provided by EPA. The permittee may also submit electronically the annual report as required in §IV.D, above. The permittee must certify all DMRs, and all other reports, in accordance with the requirements of Part VII.E. ("Signatory Requirements"). The permittee must retain the legible originals of these documents and make them available, upon request, to the EPA Region 10 Director, Office of Compliance and Enforcement and to IDEQ.

C. Monitoring Procedures

Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit or approved by EPA as an alternate test procedure under 40 CFR §136.5.

D. Additional Monitoring by Permittee

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR Part 136 or as specified in this permit, the permittee must include the results of this monitoring in the calculation and reporting of the data submitted in the DMR.

Upon request by EPA or IDEQ, the permittee must submit results of any other sampling, regardless of the test method used.